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*Attorneys for Defendant, State Farm Fire and Casualty Company (improperly pled as State Farm Insurance Company)*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ROBERT AND PATRICIA HANSEN,  
HUSBAND AND WIFE,

Civil Action No.:

Plaintiff,

**NOTICE OF REMOVAL**

v.

STATE FARM INSURANCE COMPANY,

Defendant.

**TO: THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**PLEASE TAKE NOTICE** that Defendant, State Farm Fire and Casualty Company (improperly pled as State Farm Insurance Company) (hereinafter "State Farm") hereby removes the above entitled action from the Superior Court of New Jersey, Law Division, Bergen County, to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. § 1332(a)(1) and 28 U.S.C. § 1441, et seq. and alleges as follows:

1. An action has been commenced and is now pending in the Superior Court of New Jersey, Law Division, Bergen County, entitled Robert and Patricia Hansen, Husband and Wife v. State Farm Insurance Company, under Docket Number BER-L-7653-16 (**Exhibit 1**).

2. The Summons and Complaint were served upon Corporation Service Company on behalf of State Farm on May 9, 2017 (**Exhibit 2**).

3. Based on the foregoing, Defendant has filed this Notice of Removal within thirty (30) days of receipt as required by U.S.C. § 1446(b). No further proceedings have occurred in this action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1). Accordingly, this action is one that may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441 in that it is a civil action where the matter in controversy is likely to exceed the sum or value of \$75,000 exclusive of interest and costs, and is between citizens of different states.

5. Plaintiffs were at the time of Removal, and were at the time this action was commenced citizens and residents of the State of New Jersey (**Exhibit 1.**)

6. Defendant, State Farm Fire and Casualty Company, is at the time of Removal, and was at the time of the institution of this action, a company organized and existing by virtue of the laws of the State of Illinois with its principal place of business in the State of Illinois.

7. Plaintiffs allege that their residence suffered damage to various rooms, structural damage, property content damage, damage to the home's physical appearance and was uninhabitable for a period of time as a result of an incident that occurred on October 29, 2010 (**Exhibit 1.**)

8. Plaintiffs further allege that State Farm, which issued a homeowners policy to Plaintiffs, improperly refused to make certain payments and denied a number of their damage claims. (**Exhibit 1.**)

9. Plaintiffs further allege that as a result of the foregoing, they have sustained monetary damages and seek recovery of same (**Exhibit 1.**)

10. Plaintiffs further allege that State Farm engaged in bad faith conduct during the claims handling process and that Plaintiffs suffered financial harm, emotional harm and mental anguish (**Exhibit 1**).

11. Plaintiffs further allege that based on State Farm's conduct, Plaintiffs are entitled to punitive damages (**Exhibit 1**).

12. Based on the foregoing, the amount in controversy alleged by plaintiffs with respect to State Farm Fire and Casualty Company exceeds the \$75,000 requirement.

13. By reason of the foregoing, this action is within the Court's removal jurisdiction, pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332.

14. Written notice of the filing of this Notice of Removal will be served upon plaintiffs' counsel as required by law.

15. A true and complete copy of this Notice of Removal will be filed with the Clerk of the Superior Court of New Jersey, Law Division, Bergen County, as required by law.

**WHEREFORE**, Defendant prays that this action be removed from the Superior Court of New Jersey, Law Division, Bergen County to the United States District Court for the District of New Jersey and that the United States District Court for the District of New Jersey issue such orders and process as are necessary to preserve its jurisdiction over this matter.

DATED: June 7, 2017

Respectfully submitted,  
WHITE AND WILLIAMS LLP  
*Attorneys for Defendant,*  
*State Farm Fire and Casualty Company*

BY:   
ROBERT T. PINDULIC